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July 8, 1999

The Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C. Street S.W.  
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., **Palmyra**, Wisconsin 53 156-0904, is making the following statements:

- (1) Drenatrophin PMG is a product formulated to help maintain the healthy functioning of the adrenal glands. \*
- (2) The antigenic properties promote healthy cellular division, function, and growth.\*
- (3) The bovine adrenal **PMG<sup>TM</sup>** extract in Drenatrophin PMG appears to neutralize the circulating antibody, thereby contributing to the maintenance of cellular health.\*
- (4) Calcium is important for the healthy functioning of the nervous system and transmission of nerve impulses.\*
- (5) Maintains cellular health.\*
- (6) Supports nervous system function
- (7) Enhances metabolic efficiency.\*
- (8) Magnesium and calcium play an important role in human metabolism.\*
- (9) Magnesium functions in such reactions as nerve conduction and nerve excitability; transfer of energy, muscular activity; and many other specific processes.\*
- (10) Magnesium functions as a co-factor, assisting enzymes in catalyzing many chemical reactions. \*

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- (11) Drenatrophin PMG sustains metabolic efficiency.\*
- (12) Drenatrophin PMG provides nutritional ingredients and support for the adrenals. \*

These statements are made for a dietary supplement containing a proprietary blend of bovine adrenal **PMG™** extract and magnesium citrate. Other ingredients include calcium lactate, cellulose, and calcium stearate. And the name of the product is Drenatrophin **PMG®**.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden  
Standard Process Inc.

